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12 Attorneys for Defendants
SONY NETWORK ENTERTAINMENT AMERICA, INC. and
13 SONY COMPUTER ENTERTAINMENT AMERICA LLC

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION
17

18 ROBERT M. BOVA, individually and on behalf
19 of all others similarly situated,

20 Plaintiff,

21 v.

22 SONY NETWORK ENTERTAINMENT
AMERICA, INC., a Delaware Corporation and
23 SONY COMPUTER ENTERTAINMENT
AMERICA LLC, a Delaware Limited Liability
24 Company,

25 Defendants.
26
27
28

Case No. 3:11-cv-02316-EDL

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT**

Judge: Magistrate Judge Elizabeth D.
Laporte

1 WHEREAS, defendants Sony Network Entertainment America, Inc. ("SNEA") and Sony
2 Computer Entertainment America LLC ("SCEA"), as well as certain related entities (collectively,
3 the "Sony Defendants"), have been named as defendants in at least nineteen (19) putative class
4 action lawsuits within this District, to date (collectively, the "N.D. Cal. Sony Litigations");

5 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
6 least fourteen (14) putative class action lawsuits pending outside this District, to date, including at
7 least five (5) suits in the Central District of California, one (1) suit in the Southern District of
8 California, one (1) suit in the Southern District of New York, one (1) suit in the Eastern District
9 of New York, one (1) suit in the District of Massachusetts, one (1) suit in the Eastern District of
10 Michigan, two (2) suits in the Southern District of Texas, one (1) suit in the District of
11 Connecticut, and one (1) suit in the Southern District of Florida (collectively, with the N.D. Cal.
12 Sony Litigations, the "U.S. Sony Litigations");

13 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
14 Litigation (the "JPML") to centralize this and other matters, to which one response has been filed
15 to date, and as to which other responses, including Sony Defendants' response, are due by June 2,
16 2011.

17 WHEREAS, the current deadline for SCEA and SNEA to respond to the Complaint is
18 June 1, 2011;

19 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
20 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
21 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
22 JPML;

23 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
24 by and through their respective counsel, hereby stipulate as follows:

25 The deadline for the defendants to respond to the Complaint in the above-captioned action
26 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
27 litigation centralizing the above-captioned action with other matters, or if centralization is denied
28 by the JPML, then 30 days from the date of such order denying centralization.

1
2 Dated: May 16, 2011

FRANCIS M. GREGOREK
BETSY C. MANIFOLD
WOLF HALDENSTEIN ADLER FREEMAN &
HERZ LLP

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5 By: /s/ Betsy C. Manifold /s/ [as authorized]
6 Betsy C. Manifold

7 Attorneys for Plaintiff
ROBERT M. BOVA

8
9 Dated: May 16, 2011

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THAD A. DAVIS
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10
11
12 By: /s/ Rocky C. Tsai /s/
13 Rocky C. Tsai

14 Attorneys for Defendants
SONY NETWORK ENTERTAINMENT
15 AMERICA, INC. and SONY
16 COMPUTER ENTERTAINMENT
AMERICA LLC

17 ~~PROPOSED~~ ORDER

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19
20 Dated: May 18, 2011

21 By: U.S. District Judge

